

EXHIBIT 3

In the Matter Of:

Henry vs

Brown

KATHRYN TUMAN

September 08, 2023



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1 Q Now, there's also something called
2 Management and Process Consensus Issues, and
3 there's -- well, there are two, Tax Form Collection
4 and Professional Judgment Guidance [sic] Manuals.

5 Am I reading that correctly?

6 MS. VAN GELDER: Objection.

7 BY MR. VILLARREAL:

8 Q Is that how you read it?

9 A Yes.

10 Q So having had your recollection refreshed by
11 this document, is it fair to say -- strike that.

12 Would you agree that at least part of the
13 purpose of the 568 Group was to identify and
14 encourage the adoption of agreements with respect to
15 certain topics relating to financial aid for
16 students?

17 MS. VAN GELDER: Objection to form.

18 BY MR. VILLARREAL:

19 Q Go ahead.

20 A The purpose was to try to find agreement on
21 best practices. Whether or not they were adopted is
22 not something that I was focused on or that I
23 remember being focused on. The goal was to come up
24 with agreed-upon best practices.

25 Q But you would agree with me that the point

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1 of reaching an agreement on things is to at least
2 encourage the adoption by whatever group is working
3 on creating consensus agreements, yes?

4 MS. VAN GELDER: Objection to form.

5 THE WITNESS: I don't know.

6 BY MR. VILLARREAL:

7 Q Well, let me ask you this, was one of the
8 purposes of the 568 Group, as far as you understand
9 it, to come up with a consensus on various issues
10 pertinent to financial aid practices at
11 universities?

12 MS. VAN GELDER: Objection to form.

13 BY MR. VILLARREAL:

14 Q Go ahead.

15 A My understanding is that we were trying to
16 come up with best practices for needs analysis.
17 Whether or not individual universities could adopt
18 them or chose to adopt them, that was not something
19 that I was aware of or concerned with.

20 Q So your testimony today -- strike that.

21 Let's go through your comments on the side
22 here.

23 Comment 1, KT1, do you see that?

24 A Yes.

25 Q Which appears to be related to Consensus